

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
(Greenbelt Division)

In re:	:	
	:	
KYONGSIK JUN and	:	
MINSOO HA,	:	Case No. 23-1-3312-MCR
Debtors.	:	
	:	

**TRUSTEE'S RESPONSE TO  
SECOND MOTION TO MODIFY MORTGAGE LOAN**

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Timothy P. Branigan, trustee in the above-captioned case, responds to the Motion for Authority to Incur Secured Debt etc. The Trustee does not oppose the relief requested. If the pre-petition mortgage arrears are to be wrapped into the new loan, the plan should be amended accordingly. Plan confirmation will be considered separately. The Debtors should file a new Schedule J to reflect the new circumstances.

Respectfully submitted,

August 23, 2023

/s/ Timothy P. Branigan  
Timothy P. Branigan (Fed. Bar No. 06295)  
Chapter 13 Trustee  
9891 Broken Land Parkway, #301  
Columbia, Maryland 21046  
(410) 290-9120

**Certificate of Service**

I hereby certify that the following persons are to be served electronically via the CM/ECF system:

Christopher Wampler, Esq.

I caused a copy of the foregoing to be sent on August 24, 2023 by first-class U.S. mail, postage prepaid to:

Kyongsik Jun and Minsoo Ha  
10828 Arizona Circle, #64  
Bethesda, MD 20817

/s/ Timothy P. Branigan  
Timothy P. Branigan (Fed. Bar No. 06295)